

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STACY S.; and JOHN and MARY)	
ELLEN S., on behalf of their)	Civil Action No. 04-150E
daughter, LEIGH ANN S., a minor)	
)	
Plaintiff,)	Jury Trial Demanded
)	
v.)	
)	ELECTRONICALLY FILED
GIRARD SCHOOL DISTRICT;)	
ROBERT SNYDER, Individually)	
and in his capacity as)	
Principal of the Rice Avenue)	
Middle School; and GREGORY)	
YARBENET, a professional)	
employee of the Girard School)	
District,)	
)	
Defendants.)	

PLAINTIFFS' MOTION TO ENLARGE TIME TO FILE
PRETRIAL STATEMENT AND DISPOSITIVE MOTIONS

1. Plaintiffs have filed a motion to compel seeking discovery which is significant both for their decision of whether to file dispositive motions and their pretrial statement.

2. Plaintiffs request that the obligation to file a pretrial statement and/or dispositive motions be suspended until the discovery dispute is resolved and additional discovery obtained.

3. Plaintiffs' counsel is also involved in a trial before Judge Conti beginning October 17th. Plaintiffs have both damage expert and liability experts in this case. The reports will be submitted with the pretrial. Plaintiffs' counsel would be prejudiced in terms of dealing with those expert reports and preparing for the trial before Judge Conti.

4. Plaintiffs request at least an additional twenty-one (21) days to file dispositive motions and/or pretrial statement because of this.

WHEREFORE, Plaintiffs request they have until November 10, 2005, to file their dispositive motions and/or pretrial statement.

Respectfully submitted,

s/ Edward A. Olds
Edward A. Olds, Esquire
Pa. I.D. No. 23601
Carolyn Spicer Russ, Esquire
Pa. I.D. No. 36232
Richard Matesic, Esquire
Pa. I.D. No. 72211
Attorneys for Plaintiffs

1007 Mt. Royal Boulevard
Pittsburgh, PA 15223
(412) 492-8975

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Richard A. Lanzillo, Esquire
KNOX McLAUGHLIN GORNALL & SENNETT, P.C.
120 West Tenth Street
Erie, PA 16501

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participant:

Edward J. Betza, Esquire
150 East Eighth Street
Erie, PA 16501

s/Edward A. Olds, Esquire
